

JOSEPH P. RUSSONIELLO (CSBN 44332)
United States Attorney

BRIAN J. STRETCH (CSBN 163973)
Chief, Criminal Division

ALLISON MARSTON DANNER (CSBN 195046)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7144
FAX: (415) 436-7234
Email: allison.danner@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA, |) | NO. CR 07-00654 CRB |
| Plaintiff, |) | |
| v. |) | UNITED STATES' LIST OF RELEVANT |
| |) | DOCUMENTS |
| E. ANYANWU & L. ASHIEGBU, |) | |
| Defendant. |) | Hearing Date: April 23, 2008 |
| |) | Time: 2:15 p.m. |
| |) | Court: The Hon. Charles R. Breyer |

DATED: April 4, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney


ALLISON M. DANNER
Assistant United States Attorney

UNITED STATES' LIST OF RELEVANT DOCUMENTS
UNITED STATES OF AMERICA v. LINDA ASHIEGBU & EMMANUEL ANYANWU
CR 07-00654 CRB

| DOCUMENT NUMBER | HOW OBTAINED | DESCRIPTION |
|----------------------------|--------------------------------------|--|
| 1 | Immigration ("A") File E. Anyanwu | Application to register for permanent status (I-485) submitted by Emmanuel Anyanwu, December 13, 2006 (ASH675-682) |
| 2 | Immigration ("A") File E. Anyanwu | Affidavit of support (I-864), KM ¹ and accompanying tax returns, 2/20/07 (ASH643-71) |
| 3 | Immigration ("A") File E. Anyanwu | Biographic Information Form, Emmanuel Anyanwu (G-325A), signed by KM, 6/22/04 (ASH737) |
| 4 | Immigration ("A") File E. Anyanwu | Letter from Emmanuel Anyanwu to Immigration, 5/4/07 (ASH638-39) |
| 5 | Taxpayer Request | KM 2004 Tax Return (ASH235-39) |
| 6 | Taxpayer Request | KM 2005 Tax Return (ASH228-34) |
| 7 | Taxpayer Request | KM 2006 Tax Return (ASH227) |
| 8 | Ex Parte Court Order | Linda and Andrew Ashiegbu 2003 Tax Return (ANW012-22) |
| 9 | Ex Parte Court Order | Linda and Andrew Ashiegbu 2005 Tax Return (ANW023-35) |
| 10 | Ex Parte Court Order | Linda and Andrew 2004 Tax Return (ANW042-58) |
| 11 | Immigration ("A") File E. Anyanwu | Passport for KM (ASH125-26) |
| 12 | PIERS Computer Database | Application for U.S. Passport for KM(ASH018) |
| 13 | PIERS Computer Database | KM Passport Records (ASH019-20) |
| 14 | ATS Computer Database | KM Travel Records (ASH021-25) |

¹ References to "KM" in this document are to the victim of the marriage fraud. The victim's true name is contained on the discovery that has been provided to defense counsel. The government's belief in this case is that many of the documents that appear under the name "KM" were not, in fact, submitted by her. This list, therefore, describes the names that appear on the relevant documents but makes no representation about who actually sent the documents listed.

| | | |
|----|--|--|
| 15 | Search Warrant for Plover Court | Letter from Emmanuel Anyanwu found on computer at Plover Court house, 4/30/2007 (ASH1723) |
| 16 | Provided by KM | Emails between KM and Emmanuel Anyanwu, 2004- 2005 (ASH583-594) |
| 17 | Immigration ("A") File E. Anyanwu | Petition for Alien Fiancé (Form I-129F), signed by KM, June 22, 2004 (ASH734-36) |
| 18 | Subpoena | Cingular Phone Records, Linda Ashiegbu, 2002-2006 (ASH371-376) |
| 19 | Immigration ("A") File E. Anyanwu | I-134, Affidavit of Support, KM, 1/2/06 (ASH698-99) |
| 20 | Immigration ("A") File E. Anyanwu | DS-156, Emmanuel Anyanwu's Nonimmigrant Visa Application, April 18, 2005 (ASH692-94) |
| 21 | Immigration ("A") File E. Anyanwu | State Department Records, Emmanuel Anyanwu's Nonimmigrant Visa Application (ASH0533-554) |
| 22 | Database | SFO Customs Records, Emmanuel Anyanwu, 8/25/06, (ASH555-56) |
| 23 | Immigration ("A") File E. Anyanwu & KM Provided | Marriage License (ASH0691) |
| 24 | KM Provided | Sworn Statement, KM, 5/21/07 (ASH09-13) |
| 25 | Search Warrant for Plover Court | Email from KM to Nigerian Embassy, found on computer at Plover Court, 5/14/06 (ASH090) |
| 26 | Search Warrant for Plover Court | Letters and Application re Emmanuel Anyanwu Visit for Wedding, April, 2001 (ASH094-100) |
| 27 | Immigration ("A") File E. Anyanwu | Letter from KM to USNIS, 4/22/04 (ASH101) |
| 28 | Search Warrant for Plover Court | Letter from Emmanuel Anyanwu to Nigerian Embassy, 11/25/03 (ASH102) |
| 29 | Search Warrant for Plover Court | I-129F, Petition for Alien Fiancé, Signed by KM 4/20/04 (ASH111-116) |
| 30 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | Flight Documents for Trip to Nigeria, KM, 1/04-2/04 (ASH118-123) |

| | | |
|----|--|---|
| 31 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | Contra Costa County Birth Certificate, KM (ASH127) |
| 32 | Search Warrant for Plover Court | IRS 1040-ES Payment Vouchers, 2006, KM (ASH130-132) |
| 33 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | W2s for KM from Oakland Port Commissioners, 2003 & 2004 (ASH133-134) |
| 34 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | W2 for KM, Cannon Business Solution, 2004 (ASH135) |
| 35 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | W2s for KM, New Era Mortgage, 2003 & 2004 (ASH136-37) |
| 36 | Search Warrant for Plover Court | Tax Returns for KM, 2003-2005 (ASH138-170) |
| 37 | Search Warrant for Plover Court | I-360 Application for Emmanuel Anyanwu, 6/4/07 (ASH174-177) |
| 38 | Immigration ("A") File E. Anyanwu & Search Warrant for Plover Court | I-134 Affidavit from KM, 3/2/05 (ASH178-79) |
| 39 | Search Warrant for Plover Court | Fingerprint Card, KM (ASH171-173) |
| 40 | Subpoena | KM Records, Employment Records, California Employment Development Department (ASH217-219) |
| 41 | Subpoena | KM Records, California Department of Real Estate (ASH325-349) |
| 42 | Provided by KM | IRS Form 4506-T, Request for Transcript of Tax Return, 6/18/07 (ASH225) |
| 43 | Search Warrant New Era Mortgage | IRS Form 1096 (2004) found at(ASH397-399) |
| 44 | Search Warrant for Plover Court | Emails and chats from L. Ashiegbu and E. Anyanwu found on computer at Plover Court (ASH405-429) |

| | | |
|----|---------------------------------------|--|
| 45 | Search Warrant for Plover Court | Email found on computer at Plover Court (ASH1727-28) |
| 46 | not used | |
| 47 | Search Warrant for Plover Court | Email found on computer at Plover Court, 4/20/06 (ASH1733) |
| 48 | Immigration ("A") File E. Anyanwu | Letter from Immigration Denying I-485 for Emmanuel Anyanwu(ASH525-531) |
| 49 | Immigration ("A") File E. Anyanwu | Notice of I-485 Interview for Emmanuel Anyanwu, 5/22/07 (ASH532) |
| 50 | Immigration ("A") File E. Anyanwu | Request for Evidence Submitted from Immigration to KM, 8/31/04 (ASH091) |
| 51 | Immigration ("A") File E. Anyanwu | Letters from Andrew Ashiegbu re Denial of Visa Application for His Son, Emmanuel Ejike Ashiegbu, 1997 & 1998 (ASH0749-753) |
| 52 | Immigration ("A") File E. Anyanwu | Documents re Visa Application Andrew Ashiegbu for Emmanuel Ejike Ashiegbu (ASH754-84) |
| 53 | Immigration ("A") File E. Anyanwu | Visa Application Filed by Andrew Ashiegbu for Emmanuel Ejike Ashiegbu, 1995 (ASH785-80) |
| 54 | Immigration ("A") File A. Ashiegbu | N-400 Application Filed by Andrew Ashiegbu, 1993 (ASH1534-39) |
| 55 | Immigration ("A") File A. Ashiegbu | 1985 Tax Return for Andrew Ashiegbu (ASH1578-1581) |
| 56 | Immigration ("A") File E. Anyanwu | Petition for Alien Fiancé (Form I-129F), signed by KM, June 20, 2004 (ASH128-29) |
| 57 | Immigration ("A") File E. Anyanwu | Passport, Federal Republic of Nigeria, for Emmanuel Anyanwu (ASH595-612) |
| 58 | Search Warrant for Plover Court | Documents from A Wedding Chapel for You, 11/22/06 (ASH613-616) |
| 59 | Search Warrant for Plover Court | Biographic Information Form (G-325A), signed by Emmanuel Anyanwu, 9/12/04 (ASH741) |
| 60 | Immigration ("A") File E. Anyanwu | Letter from James Vaughns to Immigration, 6/5/07 (ASH633) |
| 61 | Immigration ("A") File E. Anyanwu | Letter from Immigration to Emmanuel Anyanwu, 5/22/07 (ASH634) |
| 62 | New Era Search Warrant | Andrew Ashiegbu and Linda Ashiegbu 2003 Tax Returns (ASH1592-1613) |

| | | |
|----|--------------------------------------|---|
| 63 | New Era Search Warrant | Andrew Ashiegbu and Linda Ashiegbu 2004 Miscellaneous Income Tax Returns (ASH1627-1629) |
| 64 | New Era Search Warrant | Andrew Ashiegbu and Linda Ashiegbu 2005 Tax Returns (ASH1614-1626) |
| 65 | Immigration ("A") File E. Anyanwu | Letter from Immigration to E. Anyanwu, 4/18/07 |
| 66 | Immigration ("A") File E. Anyanwu | Letter from KM to Immigration and Supporting Documents, 6/22/04 (ASH684-725) |
| 67 | Taxpayer Request | KM Tax Return, 2003, (ASH1806-1811) |